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January 9, 2004

Ms. Jennifer J. Johnson
Secretary
Board of Governors
Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

RE: Docket No. R-1168
Proposed Rule: Uniform Standards for Providing
Disclosures (Regs. B, E, M, Z and DD);
Additional Amendments to Reg. Z

Dear Ms. Johnson:

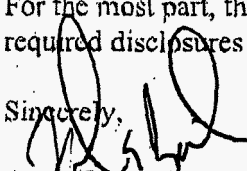
I would like to take this opportunity to comment on the proposed changes and amendments to the above referenced regulations.

We are generally in support of the proposals being considered involving the "clear and conspicuous" standard, the "reasonably understandable" standard, the "other information" standard and the "use of codes and symbols" standard. However, we do feel that the standard for "designed to call attention" which includes the suggestions for font size, margins, headings, etc. could be too cumbersome as proposed.

We are also in agreement with the suggested "additional" changes to Reg. Z unless they are subjective in nature. The "additional" changes of course would include the state law determining whether the delivery of the rescission notice to a third party would be deemed to constitute delivery to the creditor or assignee in the case where the creditor failed to initially provide the required form or designate an address of where to send it.

We believe, as proposed, that there is a need for guidance for the applicability of Reg. Z Section 226.4(b)(7) and (10), 4(d)(1) and (3) provisions to certain types of expanded coverage that are now available.

For the most part, the proposed changes will be helpful guidance to Financial Institutions when creating required disclosures and should enhance consumer understanding.

Sincerely,

Frank E. Berish
President / CEO

